EXHIBIT A

Declaration of Rob Lambourne

I, Rob Lambourne, hereby declare as follows:

1.   I have personal knowledge of the facts set forth in this declaration, and I could and would testify competently and truthfully under oath regarding the facts set forth in this declaration.

2.   I am an employee of Sonos, Inc. ("Sonos") and I currently serve as a UX Director for Sonos Business. I am based in Santa Barbara, California.

3.   I began working at Sonos (which was originally called Rincon Networks) in June 2003, and I was a Director of User Experience Design at Sonos from June 2003 to July 2018.

4.   I was a founding member of the UX team at Sonos, and I worked with other developers and engineers (including Nick Millington) to build the initial version of Sonos's networked multi-zone audio system, which was launched commercially in January 2005 under the name "The Sonos Digital Music System."   The initial version of Sonos's networked multi-zone audio system was comprised of networked audio playback devices that Sonos referred to as "Sonos ZonePlayers" (model number ZP100) and networked controller devices that Sonos referred to as "Sonos Controllers" (model number CR100), along with "Desktop Controller" software for Windows computers.

5.   The initial version of Sonos's networked multi-zone audio system included technology for grouping Sonos ZonePlayers together for synchronous playback in an ad-hoc manner, which Sonos referred to as "ad-hoc" or "dynamic" grouping. With that ad-hoc grouping technology, a user that wished to listen to audio in synchrony on a group of Sonos ZonePlayers could use a Sonos Controller (or a computer running the Desktop Controller software) to select the particular ZonePlayers to group together in an ad-hoc manner, one-by-one, in order to create an ad-hoc group of ZonePlayers, which was immediately invoked for synchronous playback and would temporarily remain in existence until such time that the user wished to use the ZonePlayers for individual playback (or for grouped playback as part of a different group) and the group was destroyed. Sonos referred to such a temporary, ad-hoc group as a "zone group."

1

6.   As part of this ad-hoc grouping technology, Sonos's controller interface also included an "All Zones-Party Mode" option, which was hard-coded into Sonos Controllers (and the Desktop Controller software) and allowed a user to create an-hoc "zone group" comprising all of the ZonePlayers in the user's system with a single touch rather than requiring the user to select each of the ZonePlayers one at a time.

7.   This ad-hoc grouping technology is described in the April 2005 User Guide for the Sonos Digital Music System (SONOS-SVG2-00227441 - SONOS-SVG2-00227554):

Zone groups

Two or more zones can be grouped together to form a zone group, which allows you to play the same music across zones. You can also link all the ZonePlayers in your house with one touch by selecting **All Zones-Party Mode**. You can add and drop zones from a zone group while your music is playing.

To add a zone to a zone group

1. Touch the **Zones** button on your Controller.

Select zone where desired music is playing   *Select zone to add to group*

2. Highlight the zone or zone group you want to add a zone to, and touch **Link Zone**.

Note: The order in which you add a zone makes a difference. If you select **Link Zone** from a zone where there is no music playing, any zone you link to it will also be silent.

3. Highlight the zone you want to add to the group, and touch **OK**. If you want to join all the zones in your house to this music queue, select **All Zones-Party Mode**. All of your ZonePlayers will then play the same music until you drop the zones from the zone group.

Kitchen and Garden make up a zone group

The music queue from the added zone is automatically replaced by the music queue from the zone or zone group it was linked to so that both zones play the same music

2

8.   After the launch of the initial version of Sonos's networked multi-zone audio system in January 2005, Sonos received a lot of positive feedback on its ad-hoc grouping technology. However, I also recognized that the ad-hoc grouping technology incorporated into the initial version of Sonos's networked multi-zone audio system had certain drawbacks.

9.   For example, I recognized that if a user had an existing "zone group" of Zone Players (say, Kitchen, Living Room, and Bedroom) but wanted to use a given ZonePlayer from that existing "zone group" (say, Kitchen) for individual playback, the only way to accomplish this was by destroying the existing "zone group," at which point the existing "zone group" would cease to exist. In this respect, the only way a user could use a "zone group" having that same group membership again in the future was by re-creating a new temporary, ad-hoc "zone group" that included the same members as the previously-existing "zone group," which would require the user to repeat the ad-hoc process of selecting the ZonePlayers to include in the group one at a time.

10.   As another example, I recognized that if a user had an existing "zone group" of Zone Players (say, Kitchen, Living Room, and Bedroom) but wanted to use a given ZonePlayer from that existing "zone group" (say, Kitchen) in a new "zone group" having different group members, the only way to accomplish this was by pulling the given ZonePlayer out of the existing "zone group" and placing it into the new "zone group," which would destroy the existing "zone group" and it would cease to exist. In this respect, the only way a user could use a "zone group" having that same group membership again in the future was by re-creating a new temporary, ad-hoc "zone group" that included the same members as the previously-existing "zone group," which would also require the user to repeat the ad-hoc process of selecting the ZonePlayers to include in the group one at a time.

11.   This process was not efficient in scenarios where a user tended to create and use "zone groups" having the same group membership on multiple different occasions, and it could also become time consuming in scenarios where the groups being created (and re-created) included more than a few ZonePlayers. This was a byproduct of the fact that a "zone group" of ZonePlayers was temporary – it only existed during the limited time that the group was invoked for playback,

and as soon as a user wanted to use a member of the group for individual playback (or within a different group), the existing "zone group" would need to be destroyed, as demonstrated by the example scenarios I just described.
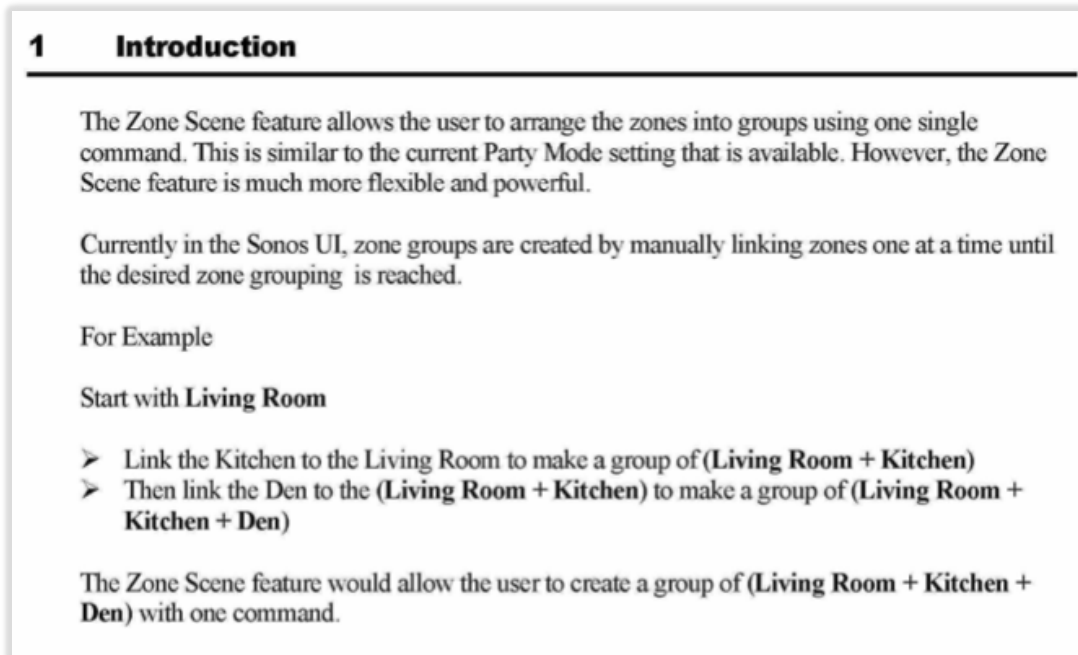
12.   As noted above, Sonos's controller interface at the time also included a hard-coded "All Zones-Party Mode" option, but that option only applied to scenarios where a user wished to form a "zone group" comprising all of the ZonePlayers in the user's system – it did not provide users with any ability to customize and pre-save their own predefined groups of ZonePlayers.

13.   In view of these drawbacks with Sonos's existing ad-hoc grouping technology, I began to design and develop new technology for grouping ZonePlayers together for synchronous playback that would enable a user to customize and pre-save predefined groupings of ZonePlayers that could later be invoked on demand for synchronous playback, which was not possible with Sonos's networked multi-zone audio system at the time.

14.   Specifically, at least as early as March 2005, I began brainstorming technology that would enable a user to customize and pre-save predefined groupings of ZonePlayers that could later be invoked on demand for synchronous playback, which I originally referred to as "macros" or "semi-permanent" zone groups. *See* SONOS-SVG2-00026625 - SONOS-SVG2-00026751. Throughout the rest of 2005, I then continued to design and develop that technology, which I eventually began referring to as the "zone scene" feature. *See id.*; SONOS-SVG2-00026839 - SONOS-SVG2-00026858; SONOS-SVG2-00026888 - SONOS-SVG2-00026889. My work on the "zone scene" technology throughout 2005 ultimately culminated in me drafting a "Sonos UI Specification" for "Zone Scenes" in December 2005, which provided a more detailed description of the "zone scene" technology that I had designed and developed up until that date. *See* SONOS-SVG2-00026839 - SONOS-SVG2-00026858.

15.   As explained in my Sonos UI Specification, the "zone scene" technology I had designed and developed was a new feature that was intended to provide certain advantages over the current ad-hoc grouping technology of Sonos's networked multi-zone audio system at the time. In particular, the "Introduction" section of my Sonos UI Specification explained that the "zone

4

scene" technology would allow a user to avoid the need to "manually link[] zones one at a time until the desired zone grouping is reached" each time a "zone group" was created as was required in Sonos's current system at the time, and would also be "more flexible and powerful" than the hard-coded "All Zones-Party Mode" option that was available in Sonos's current system at the time:

1   Introduction

The Zone Scene feature allows the user to arrange the zones into groups using one single command. This is similar to the current Party Mode setting that is available. However, the Zone Scene feature is much more flexible and powerful.

Currently in the Sonos UI, zone groups are created by manually linking zones one at a time until the desired zone grouping is reached.

For Example

Start with **Living Room**

➢ Link the Kitchen to the Living Room to make a group of (**Living Room + Kitchen**)
➢ Then link the Den to the (**Living Room + Kitchen**) to make a group of (**Living Room + Kitchen + Den**)

The Zone Scene feature would allow the user to create a group of (**Living Room + Kitchen + Den**) with one command.

SONOS-SVG2-00026839 - SONOS-SVG2-00026858.

16.   As confirmed by the April 2005 Sonos User Guide and my Sonos UI Specification (among other documents), Sonos's networked multi-zone audio system at the time did not have any "zone scenes" technology that would enable a user to customize and pre-save a predefined grouping of ZonePlayers that could later be invoked on demand for synchronous playback. This is consistent with my own recollection that Sonos's networked multi-zone audio system at the time did not have any "zone scene" technology.

17.   After drafting my Sonos UI Specification, I continued to refine the "zone scene" technology, and I understand that Sonos filed a U.S. provisional patent application directed to my "zone scene" technology on September 12, 2006. *See* U.S. App. No. 60/825,407. I also understand that Sonos has since filed a number of other U.S. non-provisional applications directed to my "zone

scene" technology that were based off of the September 2006 U.S. provisional patent application, and that two of these patent applications matured into granted patents that are now involved in a patent suit between Sonos and Google LLC. Those granted patents are U.S. Pat. No. 10,848,885 and U.S. Pat. No. 10,469,966, and I am a named inventor on both patents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 20th day of February, 2023, in Santa Barbara, California

Rob Lambourne

6